

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KATTEN MUCHIN ROSENMAN LLP,

Index No. 07-CV-2921-BSJ

Plaintiff

-against-

KAYVAN HAKIM, YASSMINE HAKIM and
GREAT NORTHERN INSURANCE COMPANY,

**AFFIDAVIT OF ROBERT LINK
IN SUPPORT OF DEFENDANT
GREAT NORTHERN INSURANCE
COMPANY'S MOTION FOR
SUMMARY JUDGMENT AGAINST
PLAINTIFF KATTEN MUCHIN
ROSENMAN LLP**

Defendants.
----- X

State of New York)
) ss.:
County of Nassau)

ROBERT LINK, being duly sworn, deposes and says:

1. My name is Robert Link and I am an Executive General Adjuster at the Chubb Group of Insurance Companies (an umbrella group of insurance companies to which GNIC is a member). Except where indicated otherwise, the facts set forth in this affidavit are based on my own personal knowledge or from GNIC's books and records. If called to testify, I could and would testify to the facts set forth herein.

2. A true and accurate copy of Plaintiff Katten Muchin Rosenman LLP's ("KMR") complaint is annexed hereto as Exhibit "1".

3. A true and accurate copy of GNIC's answer is annexed hereto as Exhibit "2".

4. A true and accurate copy of Policy No. 11331603-01 (12/12/97-12/12/98) (the "Policy") is annexed hereto as Exhibit "3".

5. A true and accurate copy of the December 15, 2003 Settlement in connection with the Policy's "Deluxe House Coverage" is annexed hereto as Exhibit "4".

6. A true and accurate copy of the December 15, 2003 Settlement in connection with the Policy's "Deluxe Contents Coverage" is annexed hereto as Exhibit "5".

7. Under the December 15, 2003 Settlements, GNIC provided the Hakims partial up-front settlement payments of \$230,224.14 and \$106,098.85.

8. True and accurate copies of the two December 15, 2003 Escrow Agreements are annexed hereto as Exhibits "6" and "7".

9. A true and accurate copy of KMR's December 13, 2004 letter is annexed hereto as Exhibit "8".

10. A true and accurate copy of GNIC's May 8, 2006 letter is annexed hereto as Exhibit "9".

11. A true and accurate copy of David Mark, Esq.'s May 12, 2006 letter is annexed hereto as Exhibit "10".

12. A true and accurate copy of GNIC's August 24, 2006 letter is annexed hereto as Exhibit "11".

13. A true and accurate copy of KMR's February 15, 2007 letter is annexed hereto as Exhibit "12".

14. A true and accurate copy of GNIC's February 20, 2007 letter is annexed hereto as Exhibit "13".

15. A true and accurate copy of KMR's February 21, 2007 letter is annexed hereto as Exhibit "14".

16. The Hakims have never delivered the Rebuild Contract to GNIC.

17. KMR is no longer the Escrow Agent yet refuses to relinquish control of the Escrow Funds.

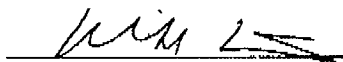
18. KMR has neither returned the Escrow Funds to GNIC nor has it deposited such funds in "a court of competent jurisdiction".

19. For the above reasons, and those set forth in GNIC's Memorandum Of Law In Support Of Its Motion For Summary Judgment, counsel informs me that GNIC is entitled to receive the Escrow Funds, and that KMR's claims for indemnity against GNIC should be dismissed as a matter of law.



Robert Link

Sworn to before me this
17 day of May 2007



Notary Public

LISA TRENTO

NOTARY PUBLIC, State of New York

No. 0111167

Qualified in Nassau County

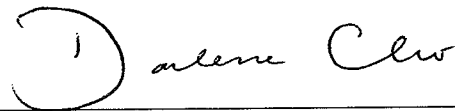
Commission Expires September 30, ~~2007~~ 2010

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) ss.:

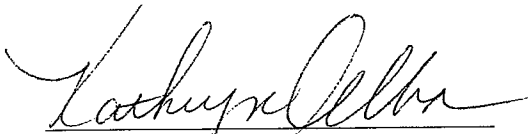
Darlene M. Cho, being duly sworn, deposes and says:

Deponent is not a party to this action, is over the age of 18 years, and resides in Bronx, New York 10468. That on the 17th day of May, 2007 deponent served the annexed Affidavit of Robert Link in Support of Defendant Great Northern Insurance Company's Motion for Summary Judgment Against Plaintiff Katten Muchin Rosenman LLP upon Michael J. Verde, Esq., Katten Muchin Rosenman, LLP, 575 Madison Avenue, New York, NY 10022-2585, attorneys for plaintiff and David J. Mark, Esq., Feder, Kaszovitz, Isaacson, Weber, Skala, Bass & Rhine, LLP, International Plaza, 750 Lexington Avenue, New York, NY 10022-1200, attorneys for defendants Kayvan Hakim and Yasmine Hakimat the address designated by said attorneys by depositing the same enclosed in a postpaid properly addressed wrapper directed to each of said attorneys at the above addresses in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.



DARLENE M. CHO

Sworn to before me this
17th day of May, 2007



Notary Public

KATHRYN ALBA
NOTARY PUBLIC, State of New York
No. 01AL4733320
Qualified in Richmond County
Commission Expires August 31, 20 09